

The Honorable Robert J. Bryan

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

STATE OF WASHINGTON,

Case No. 3:17-cv-05806-RJB

Plaintiff,

v.

**DECLARATION OF ADRIENNE
SCHEFFEY**

THE GEO GROUP, INC.,

Defendant.

I, Adrienne Scheffey, make the following statement under oath subject to the penalty of perjury pursuant to the laws of the United States and the State of Washington:

1. I am one of the attorneys for The GEO Group, Inc. (“GEO”) in the above-captioned matter. I am over the age of eighteen (18), and I am competent to testify in this matter.

2. Attached hereto as **Exhibit A** is a true and correct copy of GEO’s trial exhibit A-008.

3. Attached hereto as **Exhibit B** are true and correct copies of GEO’s trial exhibits A-004 and A-002.

4. Attached hereto as **Exhibit C** is a true and correct copy of an e-mail produced in discovery by the State, dated June 4, 2014 responding to a public inquiry as to the payment of minimum wage to detainees in the VWP.

1 5. Attached hereto as **Exhibit D** is a true and correct copy of an e-mail produced by
2 the State in discovery in this action, dated October 11, 2017, to David Johnson a former
3 employee of the Department of Labor and Industries.

4 6. Attached hereto as **Exhibit E** is a true and correct copy of an e-mail produced in
5 by the State discovery in this action, dated May 4, 2016, from Mr. Johnson, a former employee
6 of the Department of Labor and Industries.

7 7. Attached hereto as **Exhibit F** are true and correct copies of redacted memos
8 produced pursuant to Washington's Public Records Act.

9 8. Attached hereto as **Exhibit G** is a true and correct copy of an e-mail produced bu
10 the State in discovery in this action, dated March 12, 2014.

11 9. Attached hereto as **Exhibit H** is a true and correct copy of an e-mail produced
12 pursuant to Washington's Public Records Act dated March 24, 2014.

13 10. Attached hereto as **Exhibit I** is a true and correct copy of trial exhibit A-321.

14 Dated this 20th day of September, 2021, in Denver, Colorado.

15 s/ Adrienne Scheffey

16 Adrienne Scheffey